

DOCKET FILE COPY ORIGINAL

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER, LLP

A NEW YORK LIMITED LIABILITY PARTNERSHIP

901 FIFTEENTH STREET, N.W.  
WASHINGTON, D.C. 20005-2327

425 PARK AVENUE  
NEW YORK, NY 10022-3598  
(212) 836-8000  
FAX (212) 836-8689

(202) 682-3500  
FAX (202) 682-3580

NINE QUEEN'S ROAD CENTRAL  
HONG KONG  
852-2845-8989  
FAX 852-2845-3682

1999 AVENUE OF THE STARS  
LOS ANGELES, CA 90067-6048  
(310) 788-1000  
FAX (310) 788-1200

WRITER'S DIRECT DIAL NUMBER

(202) 682-3501

March 26, 1999

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Portals II Building, TW-A325  
445 12th Street, S.W.  
Washington, D.C. 20554

**RECEIVED**  
**MAR 26 1999**  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Petition for Rulemaking  
Mill Hall, Pennsylvania;  
Jersey Shore, Pennsylvania; and  
Pleasant Gap, Pennsylvania

Dear Ms. Salas:

On behalf of Forever Broadcasting, LLC, we are herewith filing an original and four (4) copies of its "Petition for Rulemaking" to reallocate Channel 249A from Jersey Shore, Pennsylvania to Mill Hall, Pennsylvania, and reallocate Channel 254A from Mill Hall, Pennsylvania to Pleasant Gap, Pennsylvania.

Should any questions arise with respect to this matter, please contact the undersigned counsel.

Respectfully submitted,

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER, LLP

By: 

Allan G. Moskowitz

No. of Copies rec'd  
List A B C D E

0+4  
M M B

BEFORE THE

# Federal Communications Commission

WASHINGTON, D.C. 20554

RECEIVED

MAR 26 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Amendment of Section 73.202(b), )  
Table of Allotments, )  
FM Broadcast Stations. )  
(Mill Hall, Pennsylvania; )  
Jersey Shore, Pennsylvania; and )  
Pleasant Gap, Pennsylvania) )

MM Docket No. \_\_\_\_\_  
RM- \_\_\_\_\_

TO: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

## PETITION FOR RULEMAKING

Forever Broadcasting, LLC ("Forever"), licensee of Radio Station WZRZ(FM), Mill Hall, Pennsylvania, by its counsel and pursuant to Section 1.420 of the Commission's Rules, hereby requests that the Commission amend Section 73.202(b) of the Commission's Rules to (1) reallocate Channel 249A from Jersey Shore, Pennsylvania to Mill Hall, Pennsylvania and modify Radio Station WVRT(FM)'s license accordingly; and (2) reallocate Channel 254A from Mill Hall, Pennsylvania to Pleasant Gap, Pennsylvania and modify Radio Station WZRZ(FM)'s license accordingly. In support thereof, the following is respectfully shown:

1. As indicated in the attached Engineering Statement of William J. Getz of Carl T. Jones Corporation, Channel 242B1 and Channel 249A are presently allotted to Jersey Shore, Pennsylvania. Radio Station WVRT(FM) operates on Channel 249A at Jersey Shore, Pennsylvania, while Radio Station WJSA-FM operates on Channel 242B1. As indicated by the attached, Channel 249A can be allotted to Mill Hall, Pennsylvania with no site restriction, and the allotment reference site complies with all Commission Rules.

2. Similarly, Channel 254A can be reallocated to Pleasant Gap, Pennsylvania as that community's first local service with a site restriction of 8.0 kilometers northwest and in compliance with all Commission Rules.

3. Pleasant Gap, Pennsylvania is a Census Designated Place with a 1990 U.S. Census population of 1,699 persons (see attached) and is located in Spring Township which is a part of Centre County. Pleasant Gap has an elementary school, a volunteer fire department, a post office, a number of local businesses, restaurants, gas stations, banks and churches. Therefore, Pleasant Gap has all the attributes of, and constitutes, a "community" for the purposes of Section 73.202(b) of the Commission's Rules. FM Channel Assignments (Biltmore Forest, North Carolina), 63 RR 2d 251 (1987). However, no AM or FM stations are currently licensed to Pleasant Gap, either commercial or non-commercial. Consequently, the allocation of Channel 254A to Pleasant Gap will constitute its first local service.

4. Furthermore, neither Mill Hall, Pennsylvania nor Jersey Shore, Pennsylvania will be left bereft of FM service in that we are herein proposing to allot Channel 249A to Mill Hall, Pennsylvania as a replacement service and Channel 242B1 will remain at Jersey Shore, Pennsylvania along with Radio Station WJSA(AM) operating at 1600 kHz.

5. The proposed reallocation complies with the Commission's Rules and would serve the Commission's allotment priorities and the public interest. In Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), recons. granted in part, 5 FCC Rcd 7094 (1990) (hereinafter, "Community of License"), the Commission stated that a proposed channel must be mutually exclusive with the existing channel and the new community must be preferred over the

existing community under the Commission's allotment priorities. The proposed allotment of Channel 254A at Pleasant Gap, Pennsylvania is mutually exclusive with the current use of Channel 254A at Mill Hall, Pennsylvania, and the proposed allotment of Channel 249A to Mill Hall, Pennsylvania is mutually exclusive with the present use of Channel 249A at Jersey Shore, Pennsylvania.

6. Moreover, as indicated, the new community, Pleasant Gap, will obtain a first local service, whereas both Mill Hall and Jersey Shore will retain service as a result of the instant proposal. Under the Commission's allotment criteria a first local service is preferred over additional local services. See, Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982).<sup>1</sup> Additionally, grant of the instant Petition will allow Radio Station WZRZ(FM) to increase to a fully spaced maximum Class A facility and the proposed arrangement of allotments will allow Radio Station WCBA-FM, Corning, Pennsylvania to increase to a fully spaced maximum Class A facility from its licensed transmitter site.

7. Attached hereto is the Declaration of Sabatino Cupelli, President of DHRB Incorporated, consenting to (1) the proposed reallocation of Channel 249A from Jersey Shore, Pennsylvania to Mill Hall, Pennsylvania, (2) the proposed change in the reference coordinates for the allotment, and (3) the modification of the license of Radio Station WVRT(FM) to operate on that channel. Furthermore, Mr. Cupelli certifies that should the Commission grant the instant proposal to, inter alia, reallocate Channel 249A from Jersey Shore, Pennsylvania to Mill Hall,

---

<sup>1</sup> As illustrated in the attached Engineering Statement, the proposed Pleasant Gap allotment will only provide 23% city grade service to the State College urbanized area and, therefore, should be considered as a first local service to Pleasant Gap. Headland, Alabama and Chattahoochee, Florida, 10 FCC Rcd 10352 (1995).

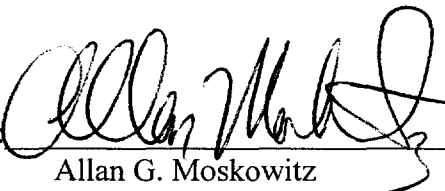
Pennsylvania, DHRB Incorporated will file an application for the new facilities and, when granted, will implement that application expeditiously.

8. Additionally, Petitioner hereby states that should the Commission grant the instant proposal to reallocate Channel 254A from Mill Hall, Pennsylvania to Pleasant Gap, Pennsylvania, and modify Radio Station WZRZ(FM)'s license accordingly, Petitioner will file an application for the new facilities and, when granted, will implement that application expeditiously.

WHEREFORE, for the foregoing reasons, Forever Broadcasting, LLC respectfully requests that the Commission amend its Table of Allotments to reallocate Channel 254A from Mill Hall, Pennsylvania to Pleasant Gap, Pennsylvania, and to reallocate Channel 249A from Jersey Shore, Pennsylvania to Mill Hall, Pennsylvania.

Respectfully submitted,

FOREVER BROADCASTING, LLC

By:   
Allan G. Moskowitz  
Its Attorney

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER, LLP  
901 15th Street, N.W., Suite 1100  
Washington, D.C. 20005  
(202) 682-3500

March 26, 1999

U.S. Department of Commerce  
Economics and Statistics Administration  
BUREAU OF THE CENSUS

1990 CPH-2-40

**CENSUS '90**



**1990 Census of  
Population and Housing  
Population and Housing  
Unit Counts**

**Pennsylvania**

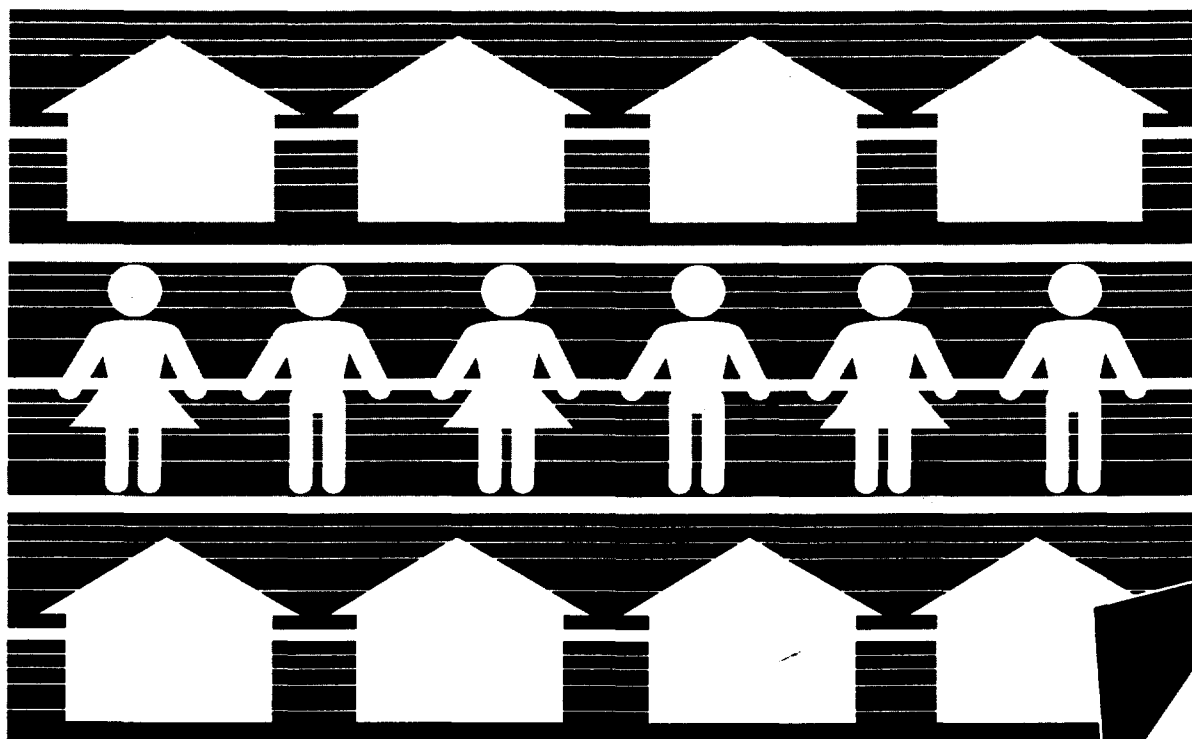


Table 9. Population and Housing Units, 1970 to 1990; Area Measurements and Density: 1990—Con.

[For information concerning historical counts, see "User Notes." Density is computed using land area. For definitions of terms and meanings of symbols, see text.]

Place and [In Selected States] County Subdivision	Population			Housing units			1990 area measurements				1990 density			
	1990	1980	1970	1990	1980	1970	Total area		Land area		Population per—		Housing units per—	
							Square kilometers	Square miles	Square kilometers	Square miles	Square kilometer	Square mile	Square kilometer	Square mile
Perry township, Lawrence County .....	1 841	2 057	1 841	700	727	572	47.8	18.5	47.7	18.4	38.6	100.1	14.7	38.0
Perry township, Mercer County .....	1 468	1 597	1 368	593	548	413	46.7	18.0	46.7	18.0	31.4	81.6	12.7	32.9
Perry township, Snyder County .....	1 873	1 721	1 280	664	571	359	67.7	26.1	67.7	26.1	27.7	71.8	9.8	25.4
Perryopolis borough, Fayette County .....	1 833	2 139	2 043	797	810	650	4.6	1.8	4.6	1.8	398.5	1 018.3	173.3	442.8
Peters township, Franklin County .....	4 090	4 060	3 838	1 628	1 524	1 213	145.1	56.0	144.7	55.9	28.3	73.2	11.3	29.1
Peters township, Washington County .....	14 467	13 104	10 672	5 105	4 227	2 956	51.2	19.8	50.7	19.6	285.3	738.1	100.7	260.5
Petersburg borough, Huntingdon County .....	469	543	555	186	189	181	1.0	0.4	1.0	0.4	469.0	1 172.5	186.0	465.0
Petrolia borough, Butler County .....	292	472	432	133	179	168	1.0	0.4	1.0	0.4	292.0	730.0	133.0	332.5
Philadelphia city, Philadelphia County .....	1 585 577	1 688 210	1 949 996	674 899	685 629	674 223	369.5	142.7	350.0	135.1	4 530.2	11 736.3	1 928.3	4 995.6
Philipsburg borough, Centre County .....	3 048	3 533	3 700	1 530	1 578	1 355	2.9	1.1	2.9	1.1	1 051.0	2 770.9	527.6	1 390.9
Phoenixville borough, Chester County .....	15 066	14 165	14 823	6 623	5 718	4 962	9.7	3.7	9.3	3.6	1 620.0	4 185.0	712.2	1 839.7
Piatt township, Lycoming County .....	1 097	1 059	1 013	459	396	314	26.3	10.1	25.5	9.9	43.0	110.8	18.0	46.4
Picture Rocks borough, Lycoming County .....	660	615	570	259	209	191	2.4	0.9	2.4	0.9	275.0	733.3	107.9	287.8
Pike township, Berks County .....	1 359	1 056	867	516	379	315	36.1	13.9	36.1	13.9	37.6	97.8	14.3	37.1
Pike township, Bradford County .....	684	598	503	331	209	140	74.7	28.8	74.3	28.7	9.2	23.8	4.5	11.5
Pike township, Clearfield County .....	2 044	2 195	1 720	769	754	506	108.3	41.8	104.7	40.4	19.5	50.6	7.3	19.0
Pike township, Potter County .....	252	230	272	251	234	186	96.0	37.1	96.0	37.1	2.6	6.8	2.6	6.8
Pillow borough, Dauphin County .....	341	359	332	137	125	125	1.2	0.5	1.2	0.5	284.2	682.0	114.2	274.0
Pine township, Allegheny County .....	4 048	3 908	2 259	1 514	1 248	1 135	43.5	16.8	43.5	16.8	93.1	241.0	34.8	90.1
Pine township, Armstrong County .....	534	656	704	286	287	278	13.3	5.1	12.7	4.9	42.0	109.0	22.5	58.4
Pine township, Clearfield County .....	43	29	34	99	72	97	83.0	32.0	83.0	32.0	0.5	1.3	1.2	3.1
Pine township, Columbia County .....	990	955	631	420	368	218	68.8	26.6	68.8	26.6	14.4	37.2	6.1	15.8
Pine township, Crawford County .....	455	435	392	387	345	189	32.6	12.6	32.6	12.6	26.6	68.9	22.6	58.6
Pine township, Indiana County .....	2 172	2 152	1 984	878	796	623	80.4	31.0	80.4	31.0	27.0	70.1	10.9	28.3
Pine township, Lycoming County .....	290	312	321	359	363	179	196.3	75.8	196.3	75.8	1.5	3.8	1.8	4.7
Pine township, Mercer County .....	4 193	3 762	3 514	1 509	1 251	954	67.4	26.0	66.6	25.7	63.0	163.2	22.7	58.7
Pine Creek township, Clinton County .....	3 188	3 100	2 272	1 251	1 118	706	38.6	14.9	37.3	14.4	85.5	221.4	33.5	86.9
Pine Creek township, Jefferson County .....	1 413	1 407	1 181	473	468	354	73.9	28.5	73.9	28.5	19.1	49.6	6.4	16.6
Pine Grove borough, Schuylkill County .....	2 118	2 244	2 197	908	910	835	2.8	1.1	2.8	1.1	756.4	1 925.5	324.3	825.5
Pine Grove township, Schuylkill County .....	3 699	3 521	2 985	1 473	1 251	989	99.3	38.3	98.9	38.2	37.4	96.8	14.9	38.6
Pinegrove township, Venango County .....	1 395	1 437	1 216	559	512	394	95.9	37.0	95.9	37.0	14.5	37.7	5.8	15.1
Pine Grove township, Warren County .....	2 756	2 576	2 256	1 101	979	765	103.5	40.0	102.8	39.7	26.8	69.4	10.7	27.7
Pine Grove Mills CDP, Centre County .....	1 129	1 030	...	431	395	...	11.2	4.3	11.2	4.3	100.8	262.6	38.5	100.2
Piney township, Clarion County .....	515	479	465	155	152	140	46.4	17.9	46.1	17.8	11.2	28.9	3.4	8.7
Pitcairn borough, Allegheny County .....	4 087	4 175	4 741	1 917	1 833	1 764	1.4	0.5	1.4	0.5	2 919.3	8 174.0	1 369.3	3 834.0
Pittsburgh city, Allegheny County .....	369 879	423 959	520 089	170 159	179 198	189 831	151.2	58.4	144.1	55.6	2 566.8	6 652.5	1 180.8	3 060.4
Pittsfield township, Warren County .....	1 543	1 623	1 452	657	699	528	144.1	55.6	144.1	55.6	10.7	27.8	4.6	11.8
Pittston city, Luzerne County .....	9 389	9 930	11 113	4 029	3 862	3 647	4.5	1.7	4.1	1.6	2 290.0	5 868.1	982.7	2 518.1
Pittston township, Luzerne County .....	2 725	3 611	3 191	1 022	1 190	971	36.9	14.3	36.9	14.2	73.8	191.9	27.7	72.0
Plainfield township, Northampton County .....	5 444	4 833	4 288	2 051	1 746	1 357	64.2	24.8	64.1	24.7	84.9	220.4	32.0	83.0
Plain Grove township, Lawrence County .....	791	754	693	347	298	216	46.6	18.0	46.3	17.9	17.1	44.2	7.5	19.4
Plains CDP, Luzerne County .....	4 694	5 455	6 606	1 999	2 098	2 136	3.6	1.4	3.6	1.4	1 303.9	3 352.9	555.3	1 427.9
Plains township, Luzerne County .....	10 988	11 338	11 481	4 379	4 218	3 558	34.4	13.3	33.7	13.0	326.1	845.2	129.9	336.8
Plateau borough, Erie County .....	467	492	354	164	162	106	8.5	3.3	8.5	3.3	54.9	141.5	19.3	49.7
Pleasant township, Warren County .....	2 443	2 574	2 390	1 287	1 220	970	96.7	37.5	96.7	37.5	38.0	97.6	14.6	37.8
Pleasant Gap CDP, Centre County .....	1 699	1 859	1 773	724	707	557	4.1	1.6	4.1	1.6	414.4	1 061.9	176.6	452.5
Pleasant Hill CDP, Lebanon County .....	1 659	1 116	1 071	704	425	359	1.9	0.7	1.9	0.7	873.2	2 370.0	370.5	1 005.7
Pleasant Hills borough, Allegheny County .....	8 884	9 604	10 409	3 515	3 466	3 009	7.1	2.7	7.1	2.7	1 251.3	3 290.4	495.1	1 301.9
Pleasant Valley township, Potter County .....	78	99	79	74	92	47	50.8	19.6	50.8	19.6	1.5	4.0	1.5	3.8
Pleasantville borough, Bedford County .....	215	275	303	85	91	99	0.2	0.1	0.2	0.1	1 075.0	2 150.0	425.0	850.0
Pleasantville borough, Venango County .....	991	1 099	1 005	371	394	394	2.5	1.0	2.5	1.0	396.4	991.0	148.4	371.0
Plum borough, Allegheny County .....	25 609	25 390	21 932	9 289	8 323	6 033	75.1	29.0	74.2	28.6	345.1	895.4	125.2	324.8
Plum township, Venango County .....	1 031	1 031	853	453	426	274	68.9	26.6	68.9	26.6	15.0	38.8	6.6	17.0
Plumcreek township, Armstrong County .....	2 400	2 303	1 734	867	793	554	111.5	43.0	109.7	42.4	21.9	56.6	7.9	20.4
Plumstead township, Bucks County .....	6 289	5 153	4 682	2 295	1 907	1 513	70.5	27.2	70.4	27.2	89.3	231.2	32.6	84.4
Plumville borough, Indiana County .....	390	431	429	150	151	144	1.3	0.5	1.3	0.5	300.0	780.0	115.4	300.0
Plunketts Creek township, Lycoming County .....	905	710	692	547	491	354	143.1	55.3	143.1	55.2	6.3	16.4	3.8	9.9
Plymouth borough, Luzerne County .....	7 134	7 605	9 536	3 318	3 291	3 583	3.1	1.2	2.8	1.1	2 547.9	6 485.5	1 185.0	3 016.4
Plymouth township, Luzerne County .....	1 773	2 437	2 614	717	966	870	41.4	16.0	40.1	15.5	44.2	114.4	17.9	46.3
Plymouth township, Montgomery County .....	15 958	17 168	16 911	6 392	6 037	4 641	22.1	8.5	21.8	8.4	732.0	1 899.8	293.2	761.0
Plymouth Meeting CDP, Montgomery County .....	6 241	...	...	2 629	...	...	9.8	3.8	9.8	3.8	636.8	1 642.4	268.3	691.8
Plymptonville CDP, Clearfield County .....	1 074	1 225	1 040	483	498	355	3.4	1.3	3.4	1.3	315.9	826.2	142.1	371.5
Pocono township, Monroe County .....	7 529	5 233	1 870	3 557	2 653	981	88.5	34.2	88.0	34.0	85.6	221.4	40.4	104.6
Pocono Pines CDP, Monroe County .....	824	...	...	1 776	...	...	11.5	4.4	10.4	4.0	79.2	206.0	170.8	444.0
Pocapson township, Chester County .....	3 266	2 331	1 556	830	579	356	21.8	8.4	21.5	8.3	151.9	393.5	38.6	100.0
Point township, Northumberland County .....	3 466	3 338	2 308	1 373	1 142	788	70.8	27.3	65.2	25.2	53.2	137.5	21.1	54.5
Point Marion borough, Fayette County .....	1 344	1 642	1 750	609	640	640	1.1	0.4	1.1	0.4	1 221.8	3 360.0	553.6	1 522.5
Polk township, Jefferson County .....	305	216	183	366	322	196	79.5	30.7	79.4	30.7	3.8	9.9	4.6	11.9
Polk township, Monroe County .....	4 517	3 265	1 284	2 246	1 762	872	78.0	30.1	77.1	29.8	58.6	151.6	29.1	75.4
Polk borough, Venango County .....	1 267	1 884	3 673	234	246	359	5.1	2.0	5.0	1.9	253.4	666.8	46.8	123.2

March 25, 1999

Secretary  
Federal Communications Commission  
Washington, DC

Dear Secretary:

On behalf of DHRB, Inc., licensee of Radio Station WVRT(FM), Jersey Shore, Pennsylvania, this will serve to certify the licensee's consent to the reallocation of Channel 249A from Jersey Shore, Pennsylvania to Mill Hall, Pennsylvania, and the modification of WVRT(FM)'s license to operate on Channel 249A at Mill Hall, Pennsylvania, and to any other changes in the Table of Allotments incidental to changing WVRT(FM)'s community of license from Jersey Shore, Pennsylvania to Mill Hall, Pennsylvania.

Furthermore, should the Commission amend the Table of Allotments to reallocate Channel 249A from Jersey Shore, Pennsylvania to Mill Hall, Pennsylvania, the licensee shall expeditiously file an application to modify WVRT(FM)'s facilities to operate on Channel 249A at Mill Hall, Pennsylvania.

Respectfully submitted,

DHRB, INC.

BY: 

SABATINO CUPELLI, PRESIDENT





STATEMENT OF WILLIAM J. GETZ  
IN SUPPORT OF A PETITION TO AMEND  
THE FM TABLE OF ALLOTMENTS

I am a Radio Engineer, an employee in the firm of Carl T. Jones Corporation with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized by Forever Broadcasting, LLC, licensee of WZRZ(FM), Mill Hall, Pennsylvania, to prepare this statement in support of a Petition to Amend the FM Table of Allotments, Section 73.202(b) of the FCC Rules. The petitioner requests that Section 73.202(b) of the FCC Rules be modified in the following manner:

	<u>Present</u>	<u>Proposed</u>
Mill Hall, PA	254A	249A
Jersey Shore, PA	242B1, 249A	242B1
Pleasant Gap, PA	----	254A

Radio station WZRZ(FM), Mill Hall, PA, is currently licensed to operate on Channel 254A (FCC File No. BLH-961020KD). Radio station WVRT(FM), Jersey Shore, PA, is currently licensed to operate on Channel 249A (FCC File No. BLH-BLH-920226KA). This Petition for Rulemaking will allow WZRZ(FM) to increase to a fully-spaced maximum Class

STATEMENT OF WILLIAM J. GETZ  
PAGE 2

A facility (6 kW ERP @ 100 m HAAT) and relocate in order to provide a first local service to Pleasant Gap, Pennsylvania. Radio station WVRT(FM) will provide a replacement service to Mill Hall, PA. In addition, the proposed arrangement of allotments will allow WCBA-FM, Corning, PA (FCC File No. BLH-890216KC) to increase to a fully-spaced maximum Class A facility (6 kW ERP @ 100 m HAAT) from its licensed transmitter site.

An engineering study of all pertinent allotments, assignments and applications revealed that Channel 249A can be allotted to Mill Hall, Pennsylvania, with no site restriction. The allotment reference coordinates for Channel 249A at Mill Hall, Pennsylvania, are 41° 08' 03" N.L. and 77° 28' 09" W.L.<sup>1</sup> The Mill Hall allotment reference site meets the allotment standards, the minimum spacing requirements of §73.207 and the city-grade coverage requirements of §73.315 of the FCC rules.

An engineering study of all pertinent allotments, assignments and applications revealed that Channel 254A can be allotted to Pleasant Gap, Pennsylvania, [population 1,699] with a site restriction of 8.0 kilometers northwest. The allotment reference coordinates for Channel 254A at Pleasant Gap, Pennsylvania, are 40° 55' 58" N.L. and 77° 45' 40" W.L. The Pleasant Gap allotment reference site meets the allotment standards, the minimum spacing requirements of §73.207 and the city-grade coverage requirements of §73.315 of the FCC rules. WZRZ(FM) would be the first local service for Pleasant Gap, PA. As illustrated in Exhibit 1, the proposed Pleasant Gap Class A

---

<sup>1</sup> This is an existing tower site (Tower Registration Number 1026154).

STATEMENT OF WILLIAM J. GETZ  
PAGE 3

allotment will provide 100% of Pleasant Gap with city-grade service and only 23% of the U.S. Census-designated State College, PA, urbanized area with city-grade service.

This statement was prepared by me or under my direct supervision and is believed to be true and correct.

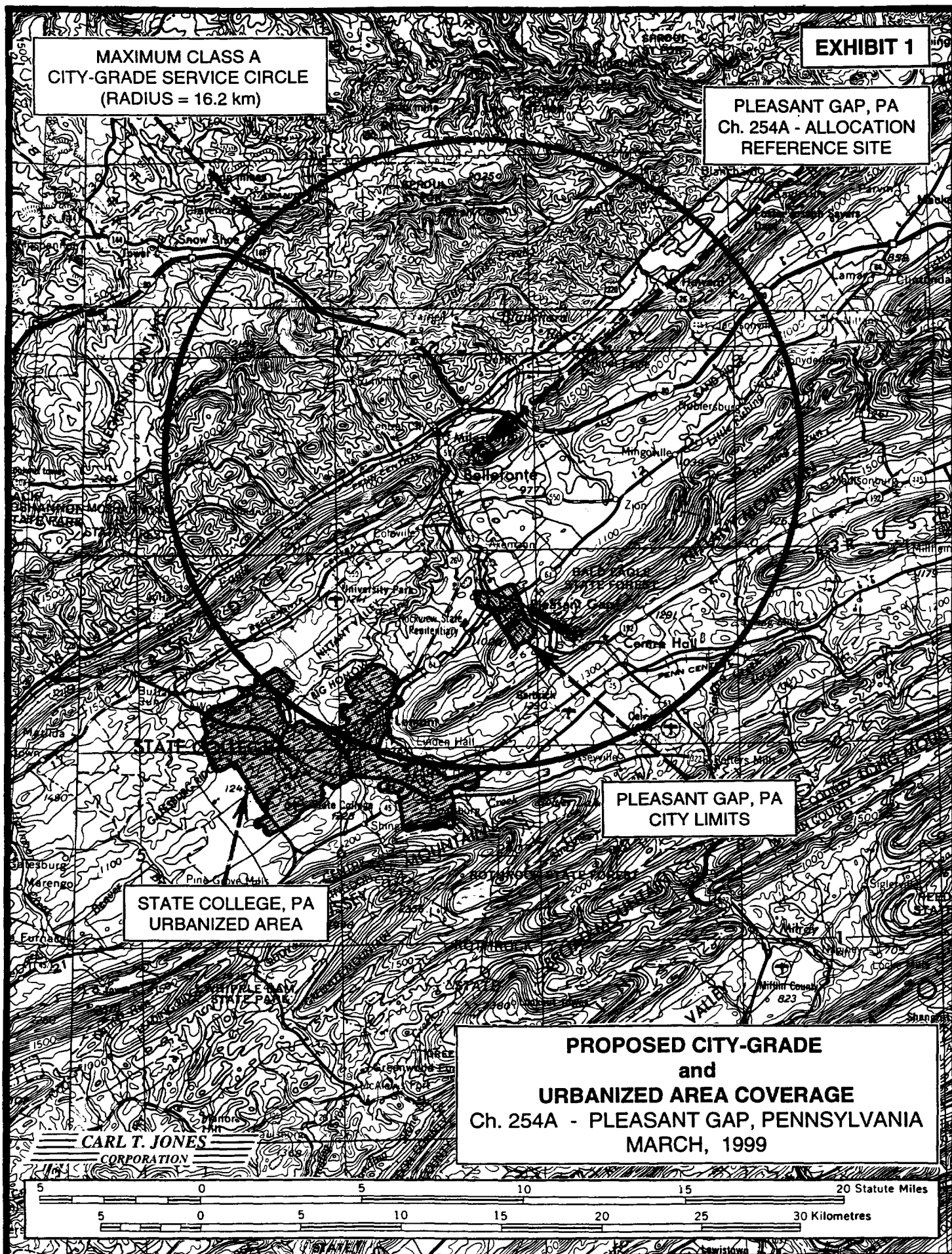
DATED: March 16, 1999

  
\_\_\_\_\_  
William J. Getz

**EXHIBIT 1**

**MAXIMUM CLASS A  
CITY-GRADE SERVICE CIRCLE  
(RADIUS = 16.2 km)**

**PLEASANT GAP, PA  
Ch. 254A - ALLOCATION  
REFERENCE SITE**

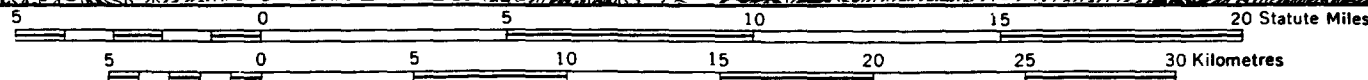


**PLEASANT GAP, PA  
CITY LIMITS**

**STATE COLLEGE, PA  
URBANIZED AREA**

**PROPOSED CITY-GRADE  
and  
URBANIZED AREA COVERAGE  
Ch. 254A - PLEASANT GAP, PENNSYLVANIA  
MARCH, 1999**

**CARL T. JONES  
CORPORATION**



**CERTIFICATE OF SERVICE**

I, Diane E. Bateman, of the law firm Kaye, Scholer, Fierman, Hays & Handler, LLP, do hereby certify that on this 26th day of March, 1999, a copy of the foregoing "Petition for Rulemaking" was hand-delivered to the following:

John A. Karousos  
Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

  
Diane E. Bateman